

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:19-MJ-374
v.)	
)	The Hon. Theresa C. Buchanan
CLARA D. O'NEAL,)	
Defendant.)	
)	

**GOVERNMENT'S AMENDED PROPOSED JURY
INSTRUCTIONS**

The United States respectfully requests that the Court include the following amended Government's Proposed Jury Instruction No. 26 in its charge to the Jury, modifying the Proposed Jury Instructions submitted by the United States on October 16, 2019. The United States also respectfully requests that the Court include in its charge to the Jury any other instructions if necessary and appropriate during the trial of this case.

Respectfully submitted,

G. ZACHARY TERWILLIGER
United States Attorney

By: /s/
Sara A. Hallmark
Special Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Tel: (703) 299-3947
Fax: (703) 299-3980
Email: sara.hallmark@usdoj.gov

GOVERNMENT’S PROPOSED JURY INSTRUCTION NO. 26

Assault, Resist, Oppose, Impede, Intimidate, Interfere With a Law Enforcement Officer-

Elements

The government must prove beyond a reasonable doubt each of the following five elements in order to find the defendant guilty of the offense charged in Count Two of the Criminal Information:

- (1) The defendant assaulted, resisted, opposed, impeded, intimidated, or interfered with
Officer Gregory Sloane or Officer Naqueel Jackson;
- (2) The defendant did so forcibly;
- (3) At the time of the defendant’s conduct, Officer Gregory Sloane or Officer Naqueel
Jackson was an officer or employee of the United States;
- (4) Officer Gregory Sloane or Officer Naqueel Jackson was engaged in official duties at
the time of the defendant’s conduct; and
- (5) The conduct was done in a voluntary and intentional manner by the defendant.

(See Kevin F. O’Malley, Jay E. Grenig, Hon. William C. Lee, 2 Fed. Jury Prac. & Instr. § 24:03 (6th ed.); *Long v. United States*, 199 F.2d 717, 719 (4th Cir. 1952))

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of that electronic filing (NEF) to counsel for the defense.

/s/

Sara A. Hallmark
Special Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Tel: (703) 299-3947
Fax: (703) 299-3980
Email: sara.hallmark@usdoj.gov